

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00475-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF BRIAN A. ROSENTHAL IN SUPPORT OF DEFENDANTS'  
SECOND NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF OPPOSED  
MOTION FOR INTRA-DISTRICT TRANSFER OF VENUE  
TO THE AUSTIN DIVISION OF THE WESTERN DISTRICT OF TEXAS**

I, Brian A. Rosenthal, declare as follows:

1. I am an attorney permitted to practice law before this Court *pro hac vice* and am licensed to practice law in New York and the District of Columbia. I am a partner with the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Defendants Dell Technologies Inc., Dell Inc., and EMC Corporation in the above-captioned action. I have personal knowledge and/or am directly informed of the matters stated below and, if called, would testify to them under oath.

2. Attached hereto as **Exhibit 28** is a true and correct copy of WSOU Investments, LLC d/b/a Brazos Licensing and Development's Rule 26(a) Initial Disclosures, which was served in Cases Nos. 6:20-cv-473; 6:20-cv-474; 6:20-cv-475; 6:20-cv-476; 6:20-cv-479; 6:20-cv-480; 6:20-cv-481; 6:20-cv-482; 6:20-cv-485; and 6:20-cv-486, on April 29, 2021.

3. Attached hereto as **Exhibit 29** is a true and correct copy of a Patent Security Agreement, dated May 28, 2021, and obtained from the United States Patent and Trademark Office's website at <https://assignment.uspto.gov/patent/index.html>, on August 19, 2021.

4. Attached hereto as **Exhibit 30** is a true and correct copy of a Power of Attorney, dated August 13, 2021, and obtained from the United States Patent and Trademark Office's website at <https://portal.uspto.gov/pair/PublicPair>, on August 19, 2021.

5. Attached hereto as **Exhibit 31** is a true and correct copy of a June 1, 2021 hearing transcript from WSOU Investments LLC v. Juniper Networks, Inc., Case No. 20-cv-903 (W.D. Tex.), that was filed in Case No. 21-160 (Fed. Cir.), and obtained on August 19, 2021.

6. Attached hereto as **Exhibit 32** is a true and correct copy of Powers of Attorney, obtained from the United States Patent and Trademark Office's website at <https://ptab.uspto.gov/>, on August 19, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 20, 2021

/s/ Brian A. Rosenthal  
Brian A. Rosenthal